

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re AUTOSEIS, INC., <i>et al.</i>,¹ Debtors.	§ § § § § § § §	Chapter 11 Case No. 14-20130 Joint Administration Requested
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REQUEST FOR EMERGENCY CONSIDERATION OF FIRST DAY MOTIONS

On March 25, 2014, Autoseis, Inc.; Global Geophysical Services, Inc.; Global Geophysical EAME, Inc.; GGS International Holdings, Inc.; Accrete Monitoring, Inc.; and Autoseis Development Company (collectively, the “Debtors”) filed petitions for relief under chapter 11 of the Bankruptcy Code. Counsel for the Debtors believes that their cases qualify as “Complex Chapter 11 Cases.” The Debtors need emergency consideration of the following initial case matters:

1. Debtors’ Emergency Motion for an Order Directing Joint Administration of Chapter 11 Cases;
2. Notice of Designation as Complex Chapter 11 Bankruptcy Cases;
3. Debtors’ Emergency Motion For Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(C)(1), 364(C)(2), 364(C)(3), 364(D)(1), and 364(E) and (B) Use Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361, 362, 363, and 364, and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(B) and (C);
4. Debtors’ Emergency Motion For Interim and Final Orders Authorizing, But Not Directing, The Debtors to (I) Pay Prepetition Wages, Salaries and Other Compensation, (II) Pay Prepetition Payroll Taxes and Benefits and Continue

¹ The Debtors in these chapter 11 cases are: Autoseis, Inc. (5224); Global Geophysical Services, Inc. (4281); Global Geophysical EAME, Inc. (2130); GGS International Holdings, Inc. (2420); Accrete Monitoring, Inc. (2256); and Autoseis Development Company (9066).

Benefit Programs In The Ordinary Course, and (III) Direct Banks to Honor Checks For Payment of Prepetition Employee Payment and Program Obligations;

5. Debtors' Emergency Motion for an Interim and Final Order (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service; (II) Deeming Utilities Adequately Assured of Future Performance; and (III) Establishing Procedures for Determining Adequate Assurance of Payment;
6. Debtors' Emergency Motion for an Order (I) Authorizing The Debtors to Prepare (A) A Consolidated List Of Creditors and (B) A Consolidated List Of Top Thirty Unsecured Creditors; (II) Extending Debtors' Deadlines to File Certain Schedules and Statements Pursuant to 11 U.S.C. § 521, Fed. R. Bankr. P. 1007 and 9006, and Local Bankruptcy Rule 1007-1; and (III) Waiving Requirement to File List of Equity Security Holders;
7. Debtors' Emergency Motion Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Seeking Authority to Implement Certain Notice Procedures;
8. Debtors' Emergency Motion for Order Authorizing Continued Use of (1) Pre-Petition Bank Accounts and Business Forms and (2) Cash Management System Pending Further Analysis and Review;
9. Debtors' Emergency Motion for Authorization to: (1) Continue Pre-Petition Insurance Program; (2) Pay Any Prepetition Premiums and Related Obligations; and (3) Honor Obligations Under Prepetition Premium Financing Agreements;
10. Debtors' Emergency Motion for the Entry of Interim and Final Orders (1) Establishing Procedures for Transfers of Equity Securities; (2) Establishing an Effective Date for Notice and Sell-Down Procedures for Transfers of Claims Against the Debtor's Estate; and (3) Granting Related Relief;
11. Debtors' Emergency Application for Entry of an Interim and Final Order Authorizing the Retention and Employment of Baker Botts L.L.P. as Counsel for the Debtors and Debtors In Possession Effective Nunc Pro Tunc to the Petition Date;
12. Debtors' Emergency Application for Entry of an Interim and Final Order Authorizing the Retention and Employment of Jordan, Hyden, Womble, Culbreth & Holzer, P.C. as Counsel for the Debtors and Debtors in Possession Effective Nunc Pro Tunc to the Petition Date;
13. Debtors' Emergency Application for Entry of an Interim and Final Order Authorizing the Retention and Employment of Alvarez & Marsal North America, LLC as Restructuring Advisor for the Debtors And Debtors In Possession Nunc Pro Tunc to the Petition Date;

14. Debtors' Emergency Application for Entry of an Interim and Final Order Authorizing the Retention and Appointment of Prime Clerk LLC as Claims and Noticing Agent Under 28 U.S.C. § 156(c) and 11 U.S.C. § 327(a) Effective Nunc Pro Tunc to the Petition Date;
15. Debtors' Emergency Motion for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Case Professionals;
16. Debtors' Emergency Motion for Entry of an Order (I) Authorizing Payment of (A) Section 503(b)(9) Claims, (B) Logistics Claims, and (C) Critical Vendor Claims; (II) Directing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief;
17. Debtors' Emergency Motion for an Order Authorizing (A) Payment of Foreign Claims and (B) Granting Related Relief;
18. Debtors' Motion for an Order Authorizing Rejection of Unexpired Non-Residential Real Property Lease Nunc Pro Tunc; and
19. Debtors' Emergency Motion for Authorization to Honor Prepetition Warranty Program in the Ordinary Course of Business.

Date: March 25, 2014

Respectfully submitted,

BAKER BOTTS L.L.P.

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